## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

## PORTLAND DIVISION

UNITED STATES OF AMERICA

Case No. 3:12-CR-00659-MO

v.

REAZ QADIR KHAN,

-Proposed PROTECTIVE ORDER

Defendant.

Upon motion of the United States, the Court being advised as to the nature of this case, and there being no objection by the parties, it is hereby

ORDERED that, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, defense counsel will not reproduce or disseminate discovery material provided by the government to persons not a party to, or involved in, this case.

IT IS FURTHER ORDERED that copies may only be provided to those persons employed by the attorney of record who are necessary to assist counsel of record in preparation for trial or other proceedings in the case.

IT IS FURTHER ORDERED that defense counsel may also provide copies to such persons as the defense deems necessary to further legitimate investigation and preparation of this case.

IT IS FURTHER ORDERED that if there is additional specific discovery material not identified in the government's motion that defense counsel believes should be an exception to this Protective Order, that the parties meet and confer and then seek guidance from this Court.

The parties shall advise the Court by letter of any exceptions made to the protective order.

IT IS FURTHER ORDERED that, pursuant to Rule 6(e)(3)(E)(i) of the Federal Rules of Criminal Procedure, the government is authorized to disclose to the attorney of record records and documents received by the federal grand jury during the investigation of this matter. The materials are not to be shown by defendant's attorney of record to anyone else with the exception of the defendant and those persons employed by the attorney who are necessary to assist counsel of record in preparation for trial.

IT IS FURTHER ORDERED that no person, including defendant, who receives a copy of any document subject to this protective order from defense counsel shall use such document in any way except to assist counsel for defendant in the investigation or preparation of this case, and shall not reproduce or disseminate any such document in any way to any other person or entity except as provided for in this order.

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Nothing in this protective order shall in any manner limit the parties' right to reproduce or disseminate any document obtained from sources other than the government even if it is within the material provided to the defense by the government in the discovery process.

Dated this \_\_\_\_\_ day of April 2013.

MICHAEL W. MOSMAN United States District Judge

Presented by:

S. AMANDA MARSHALL, OSB #95347 United States Attorney District of Oregon

s/ Ethan D. Knight
ETHAN D. KNIGHT, OSB #99298
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